



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 8, 2016

Ms. Susan Mackert
Virginia Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, VA 22193

**RE: Possum Point Power Station VPDES Permit No. VA0002071:
Removal of Surface Water from Ash Pond E**

Dear Ms. Mackert:

As requested, enclosed is a summary of the process that Dominion employed to remove the surface water from Ash Pond E at Possum Point Power Station. Removal of the surface water from Ash Pond E occurred between March 25 and May 7, 2015. An initial portion of the water was decanted through VPDES permitted Outfall 005 in accordance with the station's permit. All discharge from Outfall 005 to a water way stopped on April 28, 2015. The remainder of the surface water in Ash Pond E was pumped to Ash Pond D and has not been discharged.

Please feel free to contact Ken Roller at (804) 273-3404 or kenneth.roller@dom.com should you have any questions concerning this submittal.

Sincerely,

A handwritten signature in black ink that reads "Cathy C. Taylor". The signature is written in a cursive, flowing style.

Cathy C. Taylor
Director, Electric Environmental Services

ebc:

David Craymer

Pamela Faggert

Cathy Taylor

Frank Brayton

Jeffrey Heffelman

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File Documentum: Possum Point/Water-NPDES/Compliance Reporting and Supporting
Documents/PP Process for Decanting Pond E 8 Feb 2016

Process for Removal of Surface Water from Possum Point Ash Pond E

Following is a summary of the process Dominion employed to remove surface water from Ash Pond E at the Possum Point Power Station.

Volume of Water in Ash Pond E prior to initiation of decanting:

In March 2015, prior to decanting Ash Pond E, the ash surface within the pond was topographically mapped. During that process the volume of surface water in Ash Pond E (i.e., water above the ash surface) was estimated to be 52.5 million gallons.

Decanting of Ash Pond E:

Decanting of Ash Pond E was initiated on March 25, 2015 by removal of a stop log from the decant structure associated with Outfall 005.

Between March 25 and April 13, 2015, a total of ten stop logs were removed from the decant structure, enabling surface water to decant through Outfall 005. DMR samples were collected during this period and confirmed that the discharge was compliant with all permit limits. Periodic visual observations of the discharge also indicated good water clarity, and periodic confirmatory grab samples showed constituent concentrations below applicable effluent limits.

On April 20, 2015 Dominion began pumping the remaining surface water in Ash Pond E to Ash Pond D.

On April 22, 2015 a visual observation of Outfall 005 confirmed that the discharge had been reduced to a trickle.

On April 28, 2015 all discharge to a water way from Outfall 005 was stopped by placement of a submersible pump in the concrete basin located on the outlet side of the Outfall 005 pipe. Water that exited the pipe entered the concrete basin, was collected without discharge to the water way, and was pumped back to Ash Pond E.

From May 5 through May 7, Dominion's contractor, Crofton Diving, sealed off the decant structure associated with Outfall 005 so that no water would leak from the decant structure into the concrete basin located on the outlet side of the Outfall 005 pipe.

On May 7, 2015 Dominion stopped pumping continuously from Ash Pond E to ash Pond D as the majority of the surface water in Ash Pond E had been removed.

Volumes of Water Decanted to Outfall 005 and Pumped to Ash Pond D

It is estimated that approximately 27.5 MG of water were decanted to Outfall 005 during the period from March 25 through April 20, 2015. This volume was determined using the initial volume of 52.5 million gallons, ash pond bathymetric data, and the known difference in surface elevation between the top of the first and bottom of the last stop logs removed during the decanting process. The remaining 25.3 MG of surface water in Ash Pond E was pumped to Ash Pond D during the period from April 20 through May 7, 2015.

Clarification of the sequence for decanting Ash Pond E and statements made in a previous Dominion submittal and a DEQ Inspection Report

As described above, discharge from Ash Pond E through Outfall 005 was completely eliminated on April 28, 2015 with placement and operation of the submersible pump in the concrete basin associated with the Outfall 005 discharge structure. Consequently, April 2015 was the last month that Dominion reported a discharge from Outfall 005 on discharge monitoring reports. It has come to Dominion's attention that there may be some confusion associated with the following statements taken from a Concept Engineering Report (CER) submitted as part of the August 2015 addendum to Possum Point's application for VPDES permit modification and with a June 15, 2015 DEQ report summarizing a May 13, 2015 inspection at Possum Point. A discussion of each statement relative to the known process for decanting Ash Pond E is provided below.

CER August 2015, p 1, Section 1.2.1

"Pond E Decant Water, which refers to the surface water stored in Pond E that was discharged into Quantico Creek in May 2015 in compliance with the Station's existing VA Pollutant Discharge Elimination System (VPDES) permit by sequentially removing stop logs at the outfall structure (to Outfall 005). The Decant Water was discharged to begin dredging of ash Pond E."

Discussion: The text "in May 2015" should have read "as of May 2015" (consistent with CER August 2015, p 3, Section 1.2.2.3) since all discharges through Outfall 005 ceased on April 28, 2015. Also, the text should have been more clear that only a portion of the surface water was decanted and discharged through Outfall 005. The remainder of the surface water was pumped from Ash Pond E to Ash Pond D.

CER August 2015, p 3, Section 1.2.2.3

"Ash Pond E has been decanted as of May 2015, prior to beginning dredging activities. The decanted waters were discharged in compliance with the VPDES permit through Outfall 005 at the riser structure by removing stop logs. There have been no discharges from Pond E since the pond was decanted."

Discussion: This statement is accurate based on the sequence of events described above; however, some additional information concerning the April 28th cessation of discharge from Outfall 005 and the pumping of surface water from Ash Pond E to Ash Pond D beginning on April 20, 2015 would have provided additional clarity.

DEQ Recon Inspection Report June 15, 2015, p 1

"Ash Pond E was observed to have been dewatered, vegetation stripped from the top layer (approximately 8-10 inches), and dewatering channels cut into the ash. (Photo 1) Dewatering activities were carried out via a pump on a floating intake within Ash Pond E, which pumps water into Ash Pond D. A pump in the outfall box associated with Outfall 005 pumps any discharging water back into Ash Pond E. As a result, a discharge out of Pond E has not occurred since May 7, 2015. (Photos 2-6)"

Discussion: The above statement is accurate but should be clarified. The use of the term "decanted" instead of "dewatered" in the first sentence would be more precise. Also, May 7th was the last day that

decant water was continuously pumped from Ash Pond E to Ash Pond D. We believe that this is what was meant by "discharge out of Pond E has not occurred since May 7, 2015" in the last sentence. All discharge to a water way from Outfall 005 was stopped on April 28, 2015.